Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Accelerating Wireline Broadband	**)**	
Deployment by Removing Barriers	**)**	**WC Docket No. 17-84**
To Infrastructure Investment	**)**	

To: The Commission

REPLY COMMENTS OF THE UTILITY COALITION ON OVERLASHING

Arizona Public Service
Consumers Energy
Exelon Corporation
FirstEnergy
Hawaiian Electric Companies
Puget Sound Energy
The AES Corporation

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Filed: February 16, 2018

SUMMARY OF ARGUMENT

Without no support at all, much less support from a Professional Engineer, several commenters have misstated that overlashing has minimal if any effect on electric utility pole distribution systems. This misinformation is dangerous and is corrected by these Reply Comments.

Contrary to these unsupported claims, overlashing places a considerable additional burden on poles. As explained by the chart submitted in these Reply Comments, and as explained by the attached Declaration of Barry Lucas, P.E., Manager of Design Engineering for The Dayton Power and Light Company (an AES utility), overlashing adds to the load that distribution poles can handle in compliance with the National Electrical Safety Code ("NESC"). If this loading exceeds the levels prescribed by the Code, the safety, reliability and useful life of the electric pole distribution system suffers. If additional loading associated with overlashing is not compensated for with an appropriate remedy, the safety, reliability and useful life of the pole distribution system suffers. And a pole that is at or near full capacity because of overlashing has no more capacity available for new attachments, including of course would-be competitors of the existing communications attachers that are doing all the overlashing.

In addition, as explained by Mr. Lucas, adding additional weight (including the weight of one-half inch of ice required to be accounted for under the NESC's worst case conditions) to a cable that is strung 150 feet, 200 feet, 250 feet or 300 feet between poles will of course increase the sag of that cable mid-span and will of course affect the clearances mid-span between that cable and neighboring cables. Excessive mid-span sags can and do result in numerous dangerous and destructive accidents caused by vehicles snagging these low-hanging wires, as detailed in

documents attached hereto that depict nearly 150 such accidents over the past two years for just one *Coalition* member (FirstEnergy).

As explained, overlashing causes and exacerbates NESC mid-span ground clearance violations. Overlashing causes and exacerbates violations of NESC-required separations between communications wires. Overlashing causes and exacerbates violations of NESC pole loading standards. Overlashing causes and exacerbates excessive strain on pole guys. And overlashing is far too often installed on existing facilities that are already located dangerously close to energized facilities, jeopardizing the safety of the contractors performing the overlashing.

The only way to prevent this dangerous activity is to analyze the proposed overlashing in advance with notice that contains adequate information about the overlashing. AT&T has proposed meaningful advance notice of overlashing to address this dangerous activity and there is no defensible reason for other attaching entities not to provide it. Inconvenience alone is the excuse they offer, and simple inconvenience is far outweighed by safety and reliability concerns.

It appears instead what many existing attachers want is to preserve their advantage over new competitors, which must go through the application and review process to install new attachments to serve new customers. Since overlashing existing attachments raises the same safety, reliability and capacity issues as installing new attachments, both must be subject to similar pole owner review.

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Arizona Public Service,[1] Consumers Energy,[2] Exelon Corporation, FirstEnergy, Hawaiian Electric Companies, Puget Sound Energy and The AES Corporation (collectively, the "*Utility Coalition on Overlashing*" or "*Coalition*"),[3] respectfully submit these Reply Comments to address issues raised by Comments filed in response to the November 29, 2017 Further Notice of Proposed Rulemaking in this proceeding ("November 29 FNPRM" or "FNPRM").[4]

[1] Arizona Public Service joined the *Coalition* after Comments were filed. Arizona Public Service provides electric service to 1.2 million customers in 11 counties in Arizona. Arizona Public Service owns, in whole or in part, 517,506 electric distribution poles.

[2] Consumers Energy joined the *Coalition* after Comments were filed. Consumers Energy provides electric and natural gas service to 6.7 million people in Michigan's lower peninsula. Consumers Energy owns, in whole or in part, 1.8 million utility poles.

[3] With the addition of Arizona Public Service and Consumers Energy, *Coalition* members serve approximately 26.3 million electric customers and own, in whole or in part, approximately 10.5 million electric distribution poles.

[4] *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking (rel. November 29, 2017) ("*November 29 FNPRM*" or "*FNPRM*").

I. REPLY COMMENTS

A. Overlashing Significantly Increases the Load on Poles, Raising Safety and Engineering Issues and Leaving Considerably Less Capacity for Future Attachers

In a misguided effort to discount the need for electric utility oversight of overlashing activity, several commenters have misstated that overlashing has minimal if any effect on electric utility pole distribution systems. This misinformation is dangerous and must be corrected.

Without any support at all, much less support from a Professional Engineer, the Fiber Broadband Association claims that the effect of overlashing is negligible:

> The impact of overlashing fiber to poles normally is negligible. If the strand and pole loadings are calculated for the maximum weight that the strand can support when initially placed, then the additional weight of overlashed fiber generally has minimal effect due to the margin remaining on most strand.[5]

For its part, and again with no engineering support, the American Cable Association claims utilities are "wrong" when they argue that overlashing places additional burdens on poles.[6]

Comments like these are uninformed and dangerous, but in the experience of *Coalition* members they unfortunately typify the cavalier and uninformed attitude of many communications companies which use and continue to misuse electric utility pole distribution systems.

Contrary to the unsupported claims of the Fiber Broadband Association and American Cable Association, overlashing places a considerable additional burden on poles. As explained in the chart below and the attached Declaration of Barry Lucas, P.E., Manager of Design Engineering for The Dayton Power and Light Company (an AES utility), overlashing adds to the load that distribution poles can handle in compliance with the National Electrical Safety Code

[5] Comments of The Fiber Broadband Association at 5-6 (Filed Jan. 17, 2018).

[6] Comments of The American Cable Association at 7-8 (Filed Jan. 17, 2018) (hereinafter "ACA Comments").

("NESC").[7] If this loading exceeds the levels prescribed by the Code, the safety, reliability and useful life of the electric pole distribution system suffers. If additional loading associated with overlashing is not compensated for with an appropriate remedy, the safety, reliability and useful life of the pole distribution system suffers. And a pole that is at or near full capacity because of overlashing has no more capacity available for new attachments, including of course would-be competitors of the existing communications attachers that are doing all the overlashing.

As required by the NESC, pole loading is calculated to plan for expected worst case scenarios. In the heavy loading areas specified by the NESC (which includes most of the Midwest U.S. and all of the Northeast U.S.), loading calculations must assume 40 MPH winds with ½ of ice. This ice load increases with the circumference of the cable being attached. The larger the circumference, the greater the ice load. The greater the circumference and ice load, the greater the transverse load effect a 40-mph wind will have and the greater the chance the pole will break.

The following chart illustrates the effect that different new attachments have on the available loading capacity of a pole. A pole that is at full capacity has a loading of 100%. The first row of this chart (1995 Old N. Fairfield RD) shows existing loading on the pole of 81.82%. If a new attaching entity comes along and adds an entirely new 0.25" strand with 0.50" fiber, the loading increases to 85.75% (net increase of 3.93%). For comparison purposes, if one of the existing attachers adds just 0.50" overlashed fiber to its existing strand and fiber, then the load increases from 81.82% to 83.09% (net increase of 1.27%). If one of the existing attachers adds 2.50" overlashed fiber (which is 5 individual 0.50" cumulative overlashes), the load increases from 81.82% to 88.22% (net increase of 6.40%). If all the existing communications attachments

[7] The Declaration of Barry Lucas, P.E., is attached hereto at Exhibit A.

(five total) adds just 0.50" overlashed fiber to their existing strand and fiber, the load increases from 81.82% to 86.55% (net increase of 4.73%).

Pole_Tag	Address	Pole_ Height	Pole_ Class	Pole_Species	Pole_ Owner	Existing Loading	New Strand & Fiber	O/L 1/2" fiber	O/L 2.5" fiber	All Comms O/L 1/2" fiber	Change in loading new Strand & Fiber	Change in Loading O/L 0.5" fiber	Change in Loading O/L 2.5" fiber	Change in Loading from all comms overlash
135234	1995 Old N. Fairfield RD	50	2	Southern Pine	DP&L	81.82%	85.75%	83.09%	88.22%	86.55%	3.93%	1.27%	6.40%	4.73%
135233	2001 Old N. Fairfield RD	50	2	Southern Pine	DP&L	80.25%	84.15%	81.50%	86.53%	85.40%	3.90%	1.25%	6.28%	5.15%
135230	2027 N. Fairfield RD	50	2	Southern Pine	DP&L	87.42%	92.79%	89.21%	95.64%	95.02%	5.37%	1.79%	8.22%	7.60%
135220	2043 N. Fairfield RD	50	2	Southern Pine	DP&L	89.17%	96.25%	91.60%	98.24%	98.92%	7.08%	2.43%	9.07%	9.75%
76680	3283 Claydor dr	50	2	Southern Pine	DP&L	91.81%	100.84%	93.78%	102.05%	99.91%	9.03%	1.97%	10.24%	8.10%
314651	2079 N. Fairfield RD	50	2	Southern Pine	DP&L	53.16%	57.08%	54.42%	59.57%	57.93%	3.92%	1.26%	6.41%	4.77%
76679	2095 N. Fairfield RD	50	2	Southern Pine	DP&L	101.60%	111.81%	104.77%	113.63%	113.38%	10.21%	3.17%	12.03%	11.78%
76678	2121 N. Fairfield RD	50	2	Southern Pine	DP&L	114.41%	119.46%	116.42%	125.62%	122.89%	5.05%	2.01%	11.21%	8.48%
172095	2141 N. Fairfield RD	50	2	Southern Pine	DP&L	82.91%	88.72%	84.80%	92.65%	91.32%	5.81%	1.89%	9.74%	8.41%
120011	2169 N. Fairfield RD	50	2	Southern Pine	DP&L	81.95%	87.64%	83.82%	89.74%	90.41%	5.69%	1.87%	7.79%	8.46%
142845	2189 N. Fairfield RD	50	2	Southern Pine	DP&L	65.38%	70.97%	67.34%	71.87%	74.42%	5.59%	1.96%	6.49%	9.04%
76675	2203 N. Fairfield RD	50	2	Southern Pine	DP&L	90.21%	95.52%	92.11%	100.88%	98.75%	5.31%	1.90%	10.67%	8.54%
314652	2231 N. Fairfield RD	50	2	Southern Pine	DP&L	77.25%	82.63%	79.01%	85.20%	85.44%	5.38%	1.76%	7.95%	8.19%
221297	2309 N. Fairfield RD	50	2	Southern Pine	DP&L	157.41%	166.68%	160.31%	164.41%	178.54%	9.27%	2.90%	7.00%	21.13%
314654	2309 N. Fairfield RD	50	2	Southern Pine	DP&L	92.24%	99.67%	94.53%	102.30%	104.61%	7.43%	2.29%	10.06%	12.37%
221875	2329 N. Fairfield RD	50	2	Southern Pine	DP&L	198.33%	209.64%	202.73%	205.22%	221.86%	11.31%	4.40%	6.89%	23.53%
516138	2374 N. Fairfield RD	50	2	Southern Pine	DP&L	71.05%	75.00%	72.51%	78.39%	77.85%	3.95%	1.46%	7.34%	6.80%
314655	2374 Lakeview Dr	50	2	Southern Pine	DP&L	44.12%	46.97%	45.11%	49.10%	49.19%	2.85%	0.99%	4.98%	5.07%
314656	2374 Lakeview Dr	50	2	Southern Pine	DP&L	84.80%	94.82%	89.21%	97.62%	99.53%	10.02%	4.41%	12.82%	14.73%
486308	2389 N. Fairfield RD	50	2	Southern Pine	DP&L	102.88%	111.55%	105.77%	112.99%	113.94%	8.67%	2.89%	10.11%	11.06%
314657	2418 Esquire Dr	50	2	Southern Pine	DP&L	84.31%	89.97%	86.12%	93.36%	93.01%	5.66%	1.81%	9.05%	8.70%
314658	2434 Esquire Dr	55	2	Southern Pine	DP&L	41.26%	44.00%	42.12%	44.96%	45.59%	2.74%	0.86%	3.70%	4.33%
314659	2450 Esquire Dr	60	2	Southern Pine	DP&L	74.31%	80.84%	76.77%	84.12%	85.91%	6.53%	2.46%	9.81%	11.60%
314660	2476 Commons Blvd	60	2	Southern Pine	DP&L	127.03%	138.73%	130.58%	137.36%	141.46%	11.70%	3.55%	10.33%	14.43%

These figures vary from pole to pole, but none of these changes associated with adding overlashing is insignificant. In each case of additional overlashing, the loading on the pole must be evaluated to determine whether the pole is at capacity, and to engineer an appropriate remedy that must occur to best accommodate the new load on the pole.

B. Overlashing Can Increase Mid-Span Sags to Dangerous Levels

The American Cable Association similarly claims that utilities are "wrong" when they claim that "overlashing may cause cables to sag below clearance standards or exacerbate preexisting safety violations."[8]

This misstatement not only defies engineering principles, it defies common sense. Adding additional weight (including the weight of one-half inch of ice under the NESC's worst case conditions) to a cable that is strung 150 feet, 200 feet, 250 feet or 300 feet between poles

[8] ACA Comments at 7-8.

will of course increase the sag of that cable mid-span and will of course affect the clearances mid-span between that cable and neighboring cables.[9]

This cavalier misunderstanding of simple engineering principles is dangerous. FirstEnergy alone has documented approximately 150 accidents in the past couple years that are associated with low hanging wires. A detailed list of these accidents is attached hereto at Exhibit B. As explained in this list, the great majority of these accidents involved vehicles that snagged communications company wires hanging too low out of compliance with the NESC. Considering that overlashing is commonplace and has been a universal practice for decades, it is safe to assume most if not all of these low-hanging cables were overlashed and that the overlashing contributed significantly to the noncompliance (if it was not the sole cause).

To give the Commission a better understanding of the damage and safety issues that are caused by these low hanging wires, attached hereto at Exhibit C is a detailed report of one of these dozens of accidents from Monongahela Power (a FirstEnergy company), that includes before and after photographs showing the wreckage resulting from these low-hanging communications cables. Here is one of those photographs that shows the cables themselves associated with the accident. These cables have clearly been overlashed:

[9] Ex. A, Lucas Declaration at ¶¶ 15-16.

It is not difficult to understand that overlashing can also easily cause a communications wire mid-span to sag too close to other existing communications wires mid-span, causing a violation of NESC mid-span separation requirements between cables. In fact, overlashing can and often does cause existing wires mid-span to sag below the wires that are located below them, eliminating any separation at all. Here is one photograph depicting this problem:

Contrary to the assertions of the American Cable Association, overlashing causes and exacerbates NESC mid-span ground clearance violations. Overlashing causes and exacerbates violations of NESC-required separations between communications wires. Overlashing causes and exacerbates violations of NESC pole loading standards. Overlashing causes and exacerbates excessive strain on pole guys. And the *Coalition's* Comments already explained the enormous

concern that overlashing is far too often installed on existing facilities that are already located dangerously close to energized facilities, thereby jeopardizing the safety of the contractors performing the overlashing.[10]

The only way to prevent this dangerous activity is to analyze the proposed overlashing in advance. Pole owners need sufficient time to assess adequately each and every pole affected by overlashing to inspect for potentially hazardous preexisting safety violations, to ensure that the supporting poles are capable of supporting the additional load, to ensure the poles are appropriately guyed to counteract the overlashing, and to ensure that there will be no mid-span clearance violations. Adequate advance notice of overlashing with adequate information about the overlashing is the only way that utility pole owners can determine if the electric system will remain safe and reliable following the overlashing. And when determining the amount of notice and the information to be included in such notice, it is important to recognize that requests for overlashing are often for heavily-loaded poles located in dense, urban and rapidly growing neighborhoods. Performing an engineering assessment of these facilities should not be rushed.

Like new attachment requests, overlashing raises pole loading and safety considerations that must be addressed by the pole owner. Requiring this common sense and necessary oversight of new attachment requests but not requiring this common sense and necessary oversight of overlashing is not only detrimental to the safety and reliability of the pole distribution system, it is anticompetitive and unfair to the new attacher.

Without advance approval of overlashing, existing attachers over the decades have dramatically increased the load on poles, ignored pre-existing violations, and avoided survey and engineering costs. Without advance approval of overlashing, existing attachers have left their

[10] *See* Comments of the *Utility Coalition on Overlashing* at 11 (Filed Jan. 17, 2018).

overloaded poles and safety violations (a great many of which they caused) to be fixed by new attachers when they arrive later to install their new attachments. In these days of ever more crowded poles and increasing competition, it is fair to existing and new attachers alike (not to mention the electric utility pole owners) to require advance notice and pre-approval of overlashing.

C. There is No Defensible Reason Not to Require Advance Notice of Overlashing

In their comments, several existing communications company attachers reject any call for advance notice of overlashing, primarily because they find it inconvenient.[11] But mere inconvenience is an insufficient justification considering the more important safety, reliability, and competitive concerns explained above and in the *Coalition's* Comments.

Communications companies understand well in advance the areas in which they need to expand capacity through the use of overlashing, and have no reason to withhold this information about overlashing from utility pole owners any more than they have reason to withhold information about new attachment installations. As a result, there is no reason for them not to wait the same period of time for the approval of overlashing that they wait for the approval of new attachments. It appears therefore that the only reason they are in a rush to overlash with little or no oversight is to prevent utility pole owners from conducting an adequate safety and engineering analysis of the overlashing, which would enable the overlashing attacher to get a jump on potential competitors and lower the risk of having to pay any make-ready expenses.

[11] *See, e.g.*, Comments of Comcast Corporation (filed Jan. 17, 2018) (hereinafter "Comcast Comments"). Comcast mistakenly claims FCC rulings prohibit advance notice of overlashing and suggests these rulings are so convincing to pole owners that advance notice is not part of Comcast pole attachment agreements. Comcast Comments at 7 ("Although these rulings are clear on their face and legally binding, as the FNPRM recognizes, some pole owners still attempt to impose prior approval and notice requirements on overlashing notwithstanding this well-settled precedent. ... Comcast historically has been successful in resisting such demands by citing this precedent."). This has not been the experience of several Coalition members, but language from their Comcast attachment agreements cannot be disclosed because of confidentiality concerns."

The anticompetitive nature of such requests to eliminate advance notice of overlashing is illustrated by comparing the comments of AT&T and Verizon, both similarly-situated ILEC pole owners which provide competitive communications services. Despite being similarly situated, AT&T calls for a sensible amount of advance notice of overlashing but Verizon requests instead that all advance notice be eliminated. AT&T's sensible proposal explains:

> And, requiring advance notice to the pole owner and any host attaching entity, as proposed in the Further Notice, promotes safety and the integrity and reliability of the wireline network by affording an opportunity to validate that the attacher has considered the impact overlashing will have on the pole and the host cables. Some poles, due to age or environmental factors, and some cables may be unable to reliably support additional equipment. Overlashing just one additional cable on such a pole may cause an overload condition. Consequently, pole loading calculations performed by the prospective attacher must be a requirement. A reasoned and practical codification of the Commission's overlashing policy would allow overlashing upon at least 30 days advance notice to the pole owner and host attaching entity and confirmation from the attacher that the overlashing complies with generally accepted engineering practices, the attacher has performed a pole loading analysis and no overloading will occur, and make-ready work is not necessary or will be completed before overlashing.[12]

Verizon, for its part, ignores any consideration of maintaining a safe and reliable pole distribution system and instead claims simply that its own speed to market is impaired by such advance notice:

> The Commission should go further and prohibit utilities from requiring advance notice of overlashing because such a requirement would be cumbersome and inefficient. When a residential or business customer places a service order, Verizon often must extend (or "drop") facilities from its existing attachment to the customer's location. The extension sometimes requires Verizon to overlash its existing facilities. In these situations, Verizon often will not know until the site visit whether overlashing is necessary. It would be a significant inconvenience to

[12] Comments of AT&T Services, Inc. at 15 (Filed Jan. 17, 2018).

> the customer, not to mention costly and inefficient for a provider, if the provider were required to halt the installation in order to provide advance notice of overlashing to the pole owner. If the Commission decides to impose a notice requirement, it should establish an ex post notice requirement with a reasonable time period to comply, such as 15 business days after the overlashing is completed.[13]

The only explanation for this disparity is that Verizon is more interested that AT&T in obtaining an advantage over new attachers than it is in maintaining a safe and reliable pole distribution system. By asking that advance notice of overlashing be eliminated, Verizon is asking to be guaranteed an advantage over its communications company competitors. Verizon's advantage becomes clear when you compare what Verizon could do and what a new attaching entity must do "when a residential or business customer places a service order."[14] When this service request is placed, Verizon could simply overlash existing facilities without notice and serve that customer right away. The new attaching entity, however, would need to request access to the pole, submit an application, and wait for the survey, engineering and make-ready construction work to be completed, which likely would take several weeks or more.[15]

Moreover, Verizon makes no effort to explain how often this inconvenience it complains about occurs after some "residential or business customer places a service order," and fails to mention how many poles might be at issue. Rather that mentioning such random service order requests, it would instead be helpful for Verizon and all existing communications attachers to explain fully under oath all of the circumstances under which they overlash, the extent to which they have overlashed and will continue to overlash, and the extent of the unused facilities they do not bother to remove when they overlash. With this kind of more reliable information, the

[13] Comments of Verizon at 19-20 (Filed Jan. 17. 2018).

[14] *Id*.

[15] *See* 47 C.F.R. §1.1420.

Commission could better assess how often overlashing by Verizon and other entities has occurred pursuant to lengthy, well-planned expansions of system capacity for which pole owners could easily be provided advance notice. The Commission would also have a better sense of just how much pole loading capacity all of this unsupervised overlashing over the years has already taken up on pole distribution systems to the detriment of new communications attachers.

II. CONCLUSION

WHEREFORE, THE PREMISES CONSIDERED, the *Utility Coalition on Overlashing* urges the Commission to act in a manner consistent with the views expressed herein.

Respectfully submitted,

UTILITY COALITION ON OVERLASHING

Arizona Public Service
Consumers Energy
Exelon Corporation
FirstEnergy
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February 16, 2018

EXHIBIT A

Before the
FEDERAL COMMUNICATIONS COMMISSION
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Accelerating Wireline Broadband	)	
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To Infrastructure Investment	)	

DECLARATION OF BARRY LUCAS, P.E.

I, Barry Lucas, P.E., declare as follows:

1. My name is Barry Lucas, P.E. I am Manager of Design Engineering for The Dayton Power and Light Company ("DP&L").

2. I have been employed by DP&L for 24 years.

3. I have a B.S in Electrical Engineering from Wright State University and a Masters degree in Engineering Management from the University of Dayton.

4. I have been a Professional Engineer licensed in the State of Ohio since 2000.

5. Overlashing is the process whereby a communications company attacher on a utility pole physically ties its wiring to other wiring already secured to the pole.

6. Overlashing adds to the load that distribution poles can handle in compliance with the National Electrical Safety Code ("NESC").

7. If this loading exceeds the levels prescribed by the NESC, the safety, reliability and useful life of the electric pole distribution system suffers.

8. If additional loading associated with overlashing is not compensated for with appropriate remedy, the safety, reliability and useful life of the pole distribution system suffers.

9. A pole that is at or near full capacity because of overlashing has no more capacity available for new attachments.

10. In the heavy loading areas specified by the NESC (which includes most of the Midwest U.S. and all of the Northeast U.S.), loading calculations required by the NESC must

assume 40 MPH winds with ½ of ice. This ice load increases with the circumference of the cable being attached. The larger the circumference, the greater the ice load. The greater the circumference and ice load, the greater the transverse load effect a 40-mph wind will have and the greater the chance the pole will break.

11. The following chart illustrates the effect that different new attachments have on the available loading capacity of certain poles in DP&L's service territory that were part of an attachment application.

Pole_Tag	Address	Pole_ Height	Pole_ Class	Pole_Species	Pole_ Owner	Existing Loading	New Strand & Fiber	O/L 1/2" fiber	O/L 2.5" fiber	All Comms O/L 1/2" fiber	Change in loading new Strand & Fiber	Change in Loading O/L 0.5" fiber	Change in Loading O/L 2.5" fiber	Change in Loading from all comms overlash
135234	1995 Old N. Fairfield RD	50	2	Southern Pine	DP&L	81.82%	85.75%	83.09%	88.22%	86.55%	3.93%	1.27%	6.40%	4.73%
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135220	2043 N. Fairfield RD	50	2	Southern Pine	DP&L	89.17%	96.25%	91.60%	98.24%	98.92%	7.08%	2.43%	9.07%	9.75%
76680	3283 Claydor dr	50	2	Southern Pine	DP&L	91.81%	100.84%	93.78%	102.05%	99.91%	9.03%	1.97%	10.24%	8.10%
314651	2079 N. Fairfield RD	50	2	Southern Pine	DP&L	53.16%	57.08%	54.42%	59.57%	57.93%	3.92%	1.26%	6.41%	4.77%
76679	2095 N. Fairfield RD	50	2	Southern Pine	DP&L	101.60%	111.81%	104.77%	113.63%	113.38%	10.21%	3.17%	12.03%	11.78%
76678	2121 N. Fairfield RD	50	2	Southern Pine	DP&L	114.41%	119.46%	116.42%	125.62%	122.89%	5.05%	2.01%	11.21%	8.48%
172095	2141 N. Fairfield RD	50	2	Southern Pine	DP&L	82.91%	88.72%	84.80%	92.65%	91.32%	5.81%	1.89%	9.74%	8.41%
120011	2169 N. Fairfield RD	50	2	Southern Pine	DP&L	81.95%	87.64%	83.82%	89.74%	90.41%	5.69%	1.87%	7.79%	8.46%
142845	2189 N. Fairfield RD	50	2	Southern Pine	DP&L	65.38%	70.97%	67.34%	71.87%	74.42%	5.59%	1.96%	6.49%	9.04%
76675	2203 N. Fairfield RD	50	2	Southern Pine	DP&L	90.21%	95.52%	92.11%	100.88%	98.75%	5.31%	1.90%	10.67%	8.54%
314652	2231 N. Fairfield RD	50	2	Southern Pine	DP&L	77.25%	82.63%	79.01%	85.20%	85.44%	5.38%	1.76%	7.95%	8.19%
221297	2309 N. Fairfield RD	50	2	Southern Pine	DP&L	157.41%	166.68%	160.31%	164.41%	178.54%	9.27%	2.90%	7.00%	21.13%
314654	2309 N. Fairfield RD	50	2	Southern Pine	DP&L	92.24%	99.67%	94.53%	102.30%	104.61%	7.43%	2.29%	10.06%	12.37%
221875	2329 N. Fairfield RD	50	2	Southern Pine	DP&L	198.33%	209.64%	202.73%	205.22%	221.86%	11.31%	4.40%	6.89%	23.53%
516138	2374 N. Fairfield RD	50	2	Southern Pine	DP&L	71.05%	75.00%	72.51%	78.39%	77.85%	3.95%	1.46%	7.34%	6.80%
314655	2374 Lakeview Dr	50	2	Southern Pine	DP&L	44.12%	46.97%	45.11%	49.10%	49.19%	2.85%	0.99%	4.98%	5.07%
314656	2374 Lakeview Dr	50	2	Southern Pine	DP&L	84.80%	94.82%	89.21%	97.62%	99.53%	10.02%	4.41%	12.82%	14.73%
486308	2389 N. Fairfield RD	50	2	Southern Pine	DP&L	102.88%	111.55%	105.77%	112.99%	113.94%	8.67%	2.89%	10.11%	11.06%
314657	2418 Esquire Dr	50	2	Southern Pine	DP&L	84.31%	89.97%	86.12%	93.36%	93.01%	5.66%	1.81%	9.05%	8.70%
314658	2434 Esquire Dr	55	2	Southern Pine	DP&L	41.26%	44.00%	42.12%	44.96%	45.59%	2.74%	0.86%	3.70%	4.33%
314659	2450 Esquire Dr	60	2	Southern Pine	DP&L	74.31%	80.84%	76.77%	84.12%	85.91%	6.53%	2.46%	9.81%	11.60%
314660	2476 Commons Blvd	60	2	Southern Pine	DP&L	127.03%	138.73%	130.58%	137.36%	141.46%	11.70%	3.55%	10.33%	14.43%

12. A pole that is at full capacity has a loading of 100%. The first row of this chart (1995 Old N. Fairfield RD) shows existing loading on the pole of 81.82%. If a new attaching entity comes along and adds an entirely new 0.25" strand with 0.50" fiber, the loading increases to 85.75% (net increase of 3.93%). If one of the existing attachers adds 0.50" overlashed fiber to its existing strand and fiber, then the load increases from 81.82% to 83.09% (net increase of 1.27%). If one of the existing attachers adds 2.50" overlashed fiber (which is 5 individual 0.5" cumulative overlashes), the load increases from 81.82% to 88.22% (net increase of 6.40%). If all the existing communications attachments (five total) adds 0.50" overlashed fiber to their existing strand and fiber, the load increases from 81.82% to 86.55% (net increase of 4.73%).

13. As shown in this chart, these figures vary from pole to pole. None of these changes associated with adding overlashing is insignificant.

14. In each case of additional overlashing, the loading on the pole must be evaluated to determine whether the pole is at capacity, and to engineer an appropriate remedy that must occur to best accommodate the new load on the pole.

15. Adding additional weight (including the weight of one-half inch of ice under the NESC's worst case conditions) to a cable that is strung 150 feet, 200 feet, 250 feet or 300 feet

between poles will increase the sag of that cable mid-span and will affect the clearances mid-span between that cable and neighboring cables.

16. Overlashing can easily cause a communications wire mid-span to sag too close to other existing communications wires mid-span, causing a violation of NESC mid-span separation requirements between cables. Overlashing can and often does cause existing wires mid-span to sag below the wires that are located below them, eliminating any separation at all.

I declare under penalty of perjury that the foregoing is true and correct.

By: Barry Lucas

Barry Lucas, P.E.
The Dayton Power and Light Company

Dated: February 16, 2018

EXHIBIT B

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
Windstream Corporation	Equipment being operated by [redacted] resulted in an incident due to low Windstream lines at 9428 Pekin Rd., Russell Twp., OH 3-9-16.	2016	Low Foreign Utility	Line Contact/Low Wire	
Action Cable	Equipment being operated by [redacted] resulted in damages and the Illuminating Company being dispatched to 14334 Superior Rd., Cleveland Hts., OH on 4-28-16.	2016	Line Contact - Other	Line Contact/Low Wire	
AT&T	A vehicle driven by [redacted] struck overhead telephone cable resulting in damages to an Illuminating Company pole at 13800 Progress Pkwy., N. Royalton, OH on 4-17-16	2016	Low Foreign Utility	Line Contact/Low Wire	
Windstream Corporation	A [redacted] Co vehicle was involved in an incident resulting in the Illuminating Company being dispatched due to low Windstream to 4920 State Rd., Ashtabula , OH on May 10, 2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	A vehicle owned by [redacted] while making a delivery, came in contact with a low Cable trunk resulting in the Illuminating Company being dispatched to Riverview Rd., Brecksville, OH on 6-27-16.	2016	Line Contact - Other	Line Contact/Low Wire	
AT&T	A vehicle driven by [redacted] and owned by [redacted] was involved in an accident snagging a low wire resulting in damages to an Illuminating Company pole at 2096 S Taylor Rd., Cleveland Hts., O on 7-25-16	2016	Line Contact - Other	Line Contact/Low Wire	
Time Warner Cable	An unknown semi snagged low cable line at 5410 E. 96 St., Garfield Hts., Ohio on 8-24-16.	2016	Low Foreign Utility	Line Contact/Low Wire	
7					
[redacted]	DAMAGES & EXPENSES INCURRED TO REPLACE A POLE LOCATED @ 1195 AIRPORT RD., LAKEWOOD, NJ, WHEN SECURITY CAMERA CABLES ILLEGALLY ATTACHED TO A POLE BY [redacted] WERE STRUCK BY A VEHICLE OWNED BY [redacted] 02/2/16.	2016	Line Contact - Other	Line Contact/Low Wire	
COMCAST OF MONMOUTH	DAMAGES & EXPENSES INCURRED TO REPLACE & TRANSFER FACILITIES ONTO A NEW VERIZON POLE WHEN WIRES WERE STRUCK BY A VEHICLE OWNED BY [redacted] & OPERATED BY [redacted] ON 05/19/16.	2016	Low Foreign Utility	Line Contact/Low Wire	
2					
VERIZON PA INC, SEDGWICK CMS, PHILADELPHIA	EXPENSES INCURRED TO INSPECT & REPAIR OVER HEAD FACILITIES @ BEECH RD., CUMRU TWP., BERKS CO., PA WHEN AN UNKNOWN VEHICLE/ TRUCK HIT LOW PHONE WIRES ON 5/22/16.	2016	Low Foreign Utility	Line Contact/Low Wire	
CENTURY LINK	EXPENSES INCURRED TO INSPECT & REPAIR OVERHEAD FACILITIES @ CAMP LETTERMAN DR., NEAR YORK RD., STRABAN TWP., ADAMS CO., PA WHEN BOX TRUCK OWNED BY [redacted] & OPERATED BY [redacted] GOT CAUGHT UP ON LOW PHONE WIRE ON 5/25/16.	2016	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
VERIZON PA INC, SEDGWICK CMS, PHILADELPHIA	EXPENSES INCURRED TO INSPECT & REPLACE 2 UTILITY POLES & FACILITIES @ BLACKSMITH RD NEAR TANNERY RD, WEISENBERG TWP., LEHIGH CO., PA WHEN AN UNKNOWN TRUCK HIT LOW VERIZON WIRES AND DID NOT STOP ON 05/02/16.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	EXPENSES INCURRED TO INSPECT & REPAIR OVERHEAD FACILITIES @ 1250 POPLAR WOOD RD., BUSHKILL TWP., NORTHAMPTON CO., PA WHEN A GARBAGE TRUCK OWNED & OPERATED BY [redacted] STRUCK A LOW HANGING VERIZON PHONE WIRE ON 6/14/16 CAUSING A POWER OUTAGE.	2016	Oversize Vehicle	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	EXPENSES INCURRED TO INSPECT & REPAIR OVERHEAD FACILITIES @ 306 S WILLOW ST., FLEETWOOD, BERKS CO., PA WHEN AN UNKNOWN TRUCK CAUGHT A TELEPHONE LOOP AND TOOK DOWN MET-ED SERVICE DROP ON 8/2/16.	2016	Low Foreign Utility	Line Contact/Low Wire	
5					
FRONTIER COMMUNICATIONS	VEHICLE HIT LOW PHONE CABLE CAUSING IT TO FLIP UP AND BECOME WRAPPED WITH CONDUCTORS. CR 17 AT CR 30, GLENVILLE, WV 26351	2016	Low Foreign Utility	Line Contact/Low Wire	
1					
CenturyLink	An unknown driver of a semi damaged equipment on pole 84EB2C-31 at 889 N. Trimble Road, Mansfield, Ohio, due to a low CenturyLink wire on 02/04/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Frontier Communications	A customer noticed a low phone line and while she was calling for assistance, a truck hit the low telephone line breaking the phone line at pole 34ET1A-6 located at 5640 Port Clinton Eastern Road, Lakeside Marblehead, Ohio.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	Damages incurred when a garbage truck owned by [redacted] caught low wires owned by Time Warner Cable LLC at the address of 232 Orchard St Kent, Ohio on 03/21/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	A [redacted] cement truck driven by [redacted] struck low hanging Time Warner Cable line which damaged pole 135GD-27. Located at 7280 Woods West Road, London, Ohio, on 05/12/2016.	2016	Oversize Vehicle	Line Contact/Low Wire	
Windstream Corporation	Expenses incurred to repair equipment between poles 47CM4D-14 and 47CM4D-20 due to [redacted] snagging low hanging Windstream line near 25633 Royalton Road, Columbia Station, Ohio, on 05/27/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	A vehicle driven by [redacted] and owned by [redacted] caught low hanging Time Warner Cable line, damaging Ohio Edison equipment between poles 146HK-35 and 146HK-36 located near 2325 S. Tecumseh Road, Springfield, Ohio, on 06/25/2016.	2016	Oversize Vehicle	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
Windstream Corporation	A [redacted] cement truck with a set travel height of 12' 6" contacted a low Windstream cable line and damaged pole 42CS3C-32 located near 7327 Avon Belden Road, North Ridgeville, Ohio, on 06/30/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
AT&T	A vehicle driven by [redacted] and owned by [redacted] caught low hanging AT&T lines which damaged pole 65BT3C-502 located at 3044 Wadsworth Road, Norton, Ohio, on 06/02/2016.	2016	Line Contact - Other	Line Contact/Low Wire	
Windstream Corporation	An unknown vehicle snagged a low telephone cable and damaged Windstream pole 45BN3A-503 and Ohio Edison equipment located at 856 Southridge Road, Macedonia, Ohio, on 06/23/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
AT&T	Expenses incurred when a vehicle snagged low hanging AT&T wires on pole SP-2616 near the address of 1584 Lake Rd. Lakemore, Ohio on 07/28/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	Expenses incurred to repair facilities on pole BH-1071 located at 2831 Shade Road, Akron, Ohio, due to construction vehicle snagging low Time Warner Cable wire on 07/13/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	Expenses incurred to repair pole 127FP-50 located at 9910 Jerome Road, Dublin, Ohio, damaged when a semi with a 13 foot load contacted a Time Warner cable and messenger cable measuring less than 13 feet on 08/05/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
AT&T	A semi owned by [redacted] and operated by [redacted] caught low hanging AT&T lines and broke poles 48AT4A-1 and 58AT4B-46 and damaged service wire to 4851 E Highland Ave. Ravenna, Ohio on 07/13/2016	2016	Low Foreign Utility	Line Contact/Low Wire	
CENTURY LINK	A vehicle driven by [redacted] and owned by [redacted] caught CenturyLink line and damaged pole 84DX3-82 located at 740 5th Avenue, Mansfield, Ohio, on 09/05/2016.	2016	Oversize Vehicle	Line Contact/Low Wire	
AT&T	A vehicle owned by [redacted] and driven by [redacted] snagged low AT&T line on pole 58AX3A-38 near the address of 3022 State Route 59 Lot B58 Ravenna, Ohio on 08/08/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	A semi caught low hanging Time Warner Cable wires near the address of 2124 Pontius St NE Hartville, Ohio on 08/12/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	A vehicle driven [redacted] and owned by [redacted] 7J929H snagged a low hanging Time Warner Cable line and damaged pole 145HB-27 located at 1844 Cheviot Hills Drive, Springfield, Ohio, on 09/18/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
CENTURY LINK	A vehicle owned by [redacted] struck a low hanging CenturyLink line which damaged equipment between poles 40DM2B-9 and 40DM2B-32 located near 455 Liberty Avenue, Vermilion, Ohio, on 10/03/2016.	2016	Oversize Vehicle	Line Contact/Low Wire	
Time Warner Cable	A vehicle owned by [redacted] caught Time Warner Cable lines and damaged pole 47BB3C-44 near the address of 46 W Pioneer Tr. Aurora, Ohio on 09/01/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
Time Warner Cable	A farm vehicle driven by [redacted], and owned by [redacted] struck low hanging Time Warner Cable line which damaged pole 101FN1-66 located near 2593 Gooding Road, Marion, Ohio, on 10/16/2016.	2016	Oversize Vehicle	Line Contact/Low Wire	
Time Warner Cable	Tractor driven by [redacted] struck low hanging Time Warner Cable line which damaged pole 50BA4-50 near the address of 2195 Meloy Rd Kent, Ohio on 08/22/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
AT&T	A tractor owned and operated by [redacted] struck a low hanging AT&T line with his mower deck near 2354 New Milford Rd. Atwater, Rd, Ohio on 09/21/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	A vehicle driven by [redacted] and owned by [redacted] snagged a Time Warner Cable wire on pole 147HK-76 located near 4845 Broadway Road, Springfield, Ohio, on 10/20/2016.	2016	Oversize Vehicle	Line Contact/Low Wire	
23					
Verizon	Costs to repair and transfer facilities after two (2) Verizon poles located on McCord Rd, Philipsburg, Rush Twp, Centre Co. were damaged when a vehicle contacted an overhead Verizon wire on 1/25/16.	2016	Line Contact - Other	Line Contact/Low Wire	
Windstream Corp.	Costs to repair facilities located on W Penn St & 1st Ave, Summerville, Jefferson Co PA, damaged when a vehicle owned by [redacted] dba as [redacted] operated by [redacted] contacted low Windstream wire on 5/21/16.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Expenses incurred to repair facilities at Wattsburgh Rd, Union, Erie County, PA due to unknown vehicle catching low Verizon lines on 6/13/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Costs to repair facilities located on 1300 Gillespie Ave, Portage, Cambria Co PA, after vehicle owned by [redacted], operated by [redacted] caugh low overhead Verizon wires on 8/18/16, causing damage to Penelec facilities.	2016	Line Contact - Other	Line Contact/Low Wire	
Time Warner Cable	Expenses incurred to repair facilities at Barron Rd, McKean, Erie County, PA due to truck owned by [redacted] and operated by [redacted] catching low Time Warner Cable wires on 8/17/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Costs to remove meter and service located at 364 Patton St Ext, Clearfield PA, damaged when a [redacted] vehicle struck a low Verizon wire attached to customer owned equipment pole from pole 422-C on 9/23/16.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	Expenses incurred to repair facilities at 213 Old Rt 34, Waverly, Tioga County, NY due to vehicle owned by [redacted] and operated by [redacted] catching low Time Warner Cable line on 10/26/2016.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Costs to repair facilities & restore electric service on 12/12/16. Outage & damage occurred what a vehicle owned and operated by [redacted] contacted low overhead Verizon facilities located at 5307 Bigler Rd, Clearfield PA.	2016	Line Contact - Other	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
8					
FRONTIER COMMUNICATIONS	DAMAGE TO COMPANY FACILITIES LOCATED AT LADY SLIPPER LN, SLANESVILLE, WV ON 7/17/16 CAUSED BY DUMP TRUCK CAUGHT OH WIRES	2016	Oversize Vehicle	Line Contact/Low Wire	
1					
AT&T	A vehicle owned by [redacted] and operated by [redacted] snagged a low hanging AT&T line which caused damage to Toledo Edison facilities at 3910 Canada Southern, Toledo, Ohio.	2016	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable	Time Warner cable crossing road near 5354 State Rt 64, Swanton, was snagged by passing vehicle and was thrown into Toledo Edison primary wire causing Toledo Edison to respond and remove wire	2016	Foreign Object	Line Contact/Low Wire	
Time Warner Cable	Semi struck low hanging Time Warner cable near 16806 US 20A, West Unity Ohio causing damage to Toledo Edison equipment.	2016	Low Foreign Utility	Line Contact/Low Wire	
3					
CENTURY LINK	Charges incurred on January 6, 2016 for repairing facilities located at Chainsaw Drive, Big Cove Tannery, PA (Fulton Co.; Ayr Township). Fire Truck caught low telephone lines.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on April 1, 2016 for repairing facilities located at intersection of Smithfield Rd. & Cedar St., Masontown, PA (Fayette Co. Masontown Boro.). Tractor trailer caught Verizon's guy wire; breaking pole,	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on March 30, 2016 for repairing facilities located at Uniontown Street, Martin, PA (Fayette Co.; Nicholson Twp.). Truck tore down lines; breaking two poles	2016	Low Foreign Utility	Line Contact/Low Wire	
COMCAST	Charges incurred on March 15, 2016 for repairing facilities located at W. Wylie Avenue, Washington, PA (Washington Co.; Canton Twp.). Truck caught Comcast Communication line; burning down primary line. [redacted]	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on May 9, 2016 for repairing facilities located at Main Street, Clarion, PA (Clarion Co. Clarion Boro.). [redacted] Truck hit phone line; tearing down primary line.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on May 23, 2016 for repairing facilities located at Corner of Wiley Run Ct. & Oakland Road, Apollo, PA (Westmoreland Co.; Upper Burrell Twp.). Truck caught telephone cable and broke pole.	2016	Low Foreign Utility	Line Contact/Low Wire	
WINDSTREAM COMMUNICATIONS	Charges incurred on April 18, 2016 for repairing facilities located at County Line Road, Brockport, PA (Elk Co. Jefferson Twp.). Tractor trailer caught telephone cable and broke pole.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on May 27, 2016 for repairing facilities located at Adelaide Road, Connellsville, PA (Fayette Co.; Dunbar Twp.). Truck hit low Verizon wires and broke pole.	2016	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
WINDSTREAM COMMUNICATIONS	Charges incurred on June 22, 2016 for repairing facilities located at Bald Hill Road, Mt. Morris, PA (Greene Co.; Dunkard Twp.). Vehicle caught low communication line. [redacted]	2016	Low Foreign Utility	Line Contact/Low Wire	
WINDSTREAM COMMUNICATIONS	Charges incurred for repairing facilities located at Ash Street, Ridgway, PA (Elk Co.; Ridgway Twp.) due to accident on June 14, 2016.	2016	Line Contact - Other	Line Contact/Low Wire	
VERIZON PA INC	Charges incurred on May 27, 2016 for repairing facilities located at Bethel Church Road, North Huntingdon, PA (Westmoreland Co.; North Huntingdon Twp.). Garbage truck caught phone wires; breaking primary line.	2016	Low Foreign Utility	Line Contact/Low Wire	
WINDSTREAM COMMUNICATIONS	Charges incurred on May 24, 2016 for repairing facilities located at Route 88, Carmichaels, PA (Greene Co.; Cumberland Twp.). Garbage truck caught communication line.	2016	Low Foreign Utility	Line Contact/Low Wire	
VERIZON	Charges incurred for repairing facilities located at Brownsville Road, Pittsburgh, PA (Allegheny Co.; South Park Twp.) due to accident on July 6, 2016. Vehicle operated by [redacted]. Vehicle owned by [redacted].	2016	Line Contact - Other	Line Contact/Low Wire	
CENTURY LINK	Charges incurred on July 22, 2016 for repairing facilities located at Clay Hill Road, Mt. Waynesboro, PA (Franklin Co.; Quincy Twp.). Truck caught telephone lines and broke pole. [redacted]	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on July 11, 2016 for repairing facilities located at Woolley Fox Lane, Ligonier, PA (Westmoreland Co.; Ligonier Twp.). Vehicle caught low phone line; breaking pole. [redacted]	2016	Low Foreign Utility	Line Contact/Low Wire	
COMCAST	Charges incurred on June 13, 2016 for repairing facilities located at 1241 Route 66 (Main Street), Greensburg, PA (Westmoreland Co.; Hempfield Twp.). Bucket Truck tore down overhead lines. [redacted]	2016	Line Contact - Other	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on June 14, 2016 for repairing facilities located at Mountain Road, Uniontown, PA (Fayette Co.; Georges Twp.). Tractor trailer caught low communication line; tearing service off of house.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on August 10, 2016 for repairing facilities located at Miller Road, Spring Mills, PA (Centre Co.; Potter Twp.). Truck caught communication line; breaking pole.	2016	Low Foreign Utility	Line Contact/Low Wire	
CENTURY LINK	Charges incurred on September 2, 2016 for repairing facilities located at Thompsontown Road, West Sunbury, PA (Butler Co.; Clay Twp.). Truck struck low communication line; breaking pole.	2016	Low Foreign Utility	Line Contact/Low Wire	
CENTURY LINK	Charges incurred on August 31, 2016 for repairing facilities located at Hafer Road, Fayetteville, PA (Franklin Co.; Greene Twp.). Tuck caught overhead phone line causing broken pole.	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on September 22, 2016 for repairing facilities located at Ohio & Arch Streets, Washington, PA (Washington Co.; Canton Twp.). Vehicle snagged communication line, breaking pole.	2016	Oversize Vehicle	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
COMCAST	Charges incurred on September 26, 2016 for repairing facilities located at Twilight Hollow Road, Speers, PA (Washington Co.; Speers Boro.). Cement truck caught communication line, breaking pole.	2016	Line Contact - Other	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on September 15, 2016 for repairing facilities located at 728 Route 18, Burgettstown, PA (Washington Co.; Hanover Twp.). Tractor Trailer caught low communication line. [redacted]	2016	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on October 7, 2016 for repairing facilities located at Route 711 N and Snyder Drive, Ligonier, PA (Westmoreland Co.; Fairfield Twp.). Box Truck caught communication line.	2016	Low Foreign Utility	Line Contact/Low Wire	
AERO COMMUNICATIONS, INC.	Charges incurred for repairing facilities located at 14 Linn Farm Road in Washington, PA. (Washington Co., N. Strabane Twp.) due to accident on October 19, 2016. [redacted]	2016	Line Contact - Other	Line Contact/Low Wire	
25					
		2016 Total			
AT&T	A vehicle driven by [redacted] and owned by [redacted] was involved in an incident resulting in a wire down, the Illuminating Company being dispatched to splice, reattach, resag and renew connections at 7125 Tanglewood Drive, 3-6-17	2017	Line Contact - Other	Line Contact/Low Wire	
Time Warner Cable	A vehicle driven by [redacted] and owned by [redacted] was involved in an incident resulting in damages to an Illuminating Company pole at E 262 & Brush, Euclid, OH on 6-29-17 snagging communication line	2017	Line Contact - Other	Line Contact/Low Wire	
AT&T	A vehicle driven by [redacted] and owned by [redacted] was involved in an incident resulting in the Illuminating Company being dispatched due to downed bell and loop at 13688 Bennett Rd., N. Royalton, OH on 7-27-17.	2017	Line Contact - Other	Line Contact/Low Wire	
AT&T	A [redacted] vehicle was involved in an incident and hit bell across the street and caused damage to Illuminating Company loop and connections at 7748 Mulberry Rd., Chesterland, OH on 12-7-17.	2017	Line Contact - Other	Line Contact/Low Wire	
4					
Optimum Cable	DAMAGES & EXPENSES INCURRED TO REPLACE A POLE LOCATED ON MARTINSVILLE RD., BERNARDS, NJ, WHEN AN OPTIMUM WIRE WAS STRUCK BY A VEHICLE OWNED BY [redacted] & OPERATED BY [redacted] ON 04/18/16.	2017	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
COMCAST OF OCEAN	DAMAGES & EXPENSES INCURRED TO REPLACE A POLE LOCATED ON DUNE AVE., BRICK TWP., NJ, WHEN WIRES WERE STRUCK BY A VEHICLE OWNED BY [redacted] LLC & OPERATED BY [redacted] ON 05/19/17.	2017	Low Foreign Utility	Line Contact/Low Wire	
CenturyLink	EXPENSES INCURRED TO REPAIR FUSE WHEN LOW CENTURYLINK OVERHEAD LINES ON CEDAR ST.,NEWTON, NJ WHERE CAUGHT BY A VEHICLE OWNED BY [redacted] AND OPERATED BY [redacted] ON 9/12/2017.	2017	Line Contact - Other	Line Contact/Low Wire	
BERG, WILLIAM	EXPENSES INCURRED TO TRANSFER EQUIPMENT TO PHONE POLE ON GLENSIDE AVE., SUMMIT, NJ WHEN PHONE WIRE WAS STRUCK BY [redacted] ON 7/27/2017	2017	Foreign Object	Line Contact/Low Wire	
CenturyLink	Damages and expnese incurred to repair JCP&L facilities located on US Highway 202, Readington, NJ due to low hanging CenturyLink wires when hit by [redacted] employee (driver) [redacted] on November 17, 2017.	2017	Line Contact - Other	Line Contact/Low Wire	
5					
COMCAST OF SE PA INC	EXPENSES INCURRED TO INSPECT & REPAIR OVERHEAD FACILITIES @ 1344 KEENER RD., CONOY TWP., LANCASTER CO., PA WHEN A HARVESTER HIT LOW HANGING COMCAST WIRES ON 10/18/16.	2017	Oversize Vehicle	Line Contact/Low Wire	
CENTURY LINK	EXPENSES INCURRED TO INSPECT & REPLACE UTILITY POLE & EQUIPMENT DUE TO LOW HANGING PHONE WIRE BEING CONTACTED BY A VEHICLE ON 8/21/17 LOC OF NATURAL SPRINGS RD., BEHIND THE GIANT GROCERY STORE, STRABAN TWP., ADAMS CO. PA.	2017	Low Foreign Utility	Line Contact/Low Wire	
2					
FRONTIER COMMUNICATIONS	DELIVERY TRUCK CAUGHT FRONTIER CABLE, PULLING CUSTOMER METER POLE DOWN20 GIFFORD AVE, MORGANTOWN, WV 26501	2017	Line Contact - Other	Line Contact/Low Wire	
SPECTRUM CABLE	OVERSIZED LOAD HIT LOW SPECTRUM COMMUINICATIONS WIRE. IMPACT CAUSED LINE TO BOUNCE AND IT WAS CAUGHT BY A STANDARD SIZED TRACTOR TRAVELLING BEHIND OVERSIZED LOAD. OVERSIZED LOAD HEIGHT WAS15 FEET 2 INCHES. I-79 @ KINGMONT EXIT, FAIRMONT, WV 26554	2017	Low Foreign Utility	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	2013 [redacted] HEAVY EQUIPMENT, OPERATED BY [redacted], TURNED INTO PARKING LOT SNAGGING PHONE CABLE. INCIDENT CAUSED EXTENSIVE DAMAGE, INCLUDING 4 BROKEN POLES AND EQUIPMENT DOWN ON GROUND/STRUCTURES. N RANDOLPH AVE, ELKINS, WV 26241	2017	Line Contact - Other	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
FRONTIER COMMUNICATIONS	FOOD DELIVERY TRUCK HIT LOW PHONE CABLE BETWEEN 1181525 AND 111296062737SEMINOLE ROAD, FOREST HILL, WV 24935	2017	Line Contact - Other	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	TRUCK STRUCK LOW PHONE LINE TEARING DOWN CONDUCTOR. RESIDENT STATES HAZARD REPORTED TO FRONTIER 2-3 WEEKS PRIOR . 5050 SYCAMORE ROAD, SALEM, WV 26426	2017	Line Contact - Other	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	CEMENT TRUCK CAUGHT LOW PHONE LINE CAUSING FUSE TO OPENHUNTER LANE, MASONTOWN, WV 26542	2017	Line Contact - Other	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	[redacted] TRUCK, BACKING ON SIDE ROAD, CAUGHT LOW PHONE LINES BREAKING POLENEW HILL ROAD, MAIDSVILLE, WV 26541	2017	Line Contact - Other	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	REGULAR DELIVERY TRUCK CAUGHT NEWLY INSTALLED LOW PHONE DROP UNDER MONPOWER METER POINTLONG JOHN SILVERS, ROUTE 33, WESTON, WV 26452	2017	Line Contact - Other	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	VEHICLE CAUGHT LOW TELEPHONE WIRE ON POLE #7061-MP44RAG TAVERN RD, TERRA ALTA WV	2017	Line Contact - Other	Line Contact/Low Wire	
Frontier	TRUCK CAUGHT LOW FRONTIER WIRE, PULLING POLE #2B7511-MP10 2610 WILSONBURG RD, CLARKSBURG WV	2017	Line Contact - Other	Line Contact/Low Wire	
COMCAST CABLE	[redacted] TRUCK STRUCK GUY WIRE.MORGAN HILL ROAD, MORGANTOWN, WV 26508	2017	Line Contact - Other	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	[redacted] AND HIT DOWN PHONE GUY WITH RAISED BED PULLING SERVICE & METER FROM HOUSEWISEMAN RUN ROAD, MANNINGTON, WV 26582	2017	Line Contact - Other	Line Contact/Low Wire	
Frontier	BOX TRUCK CAUGHT FRONTIER PHONE CABLE RESULTING IN OUTAGE ON MP FACILITIES MURDOCH AVE, PARKERSBURG, WV 26101	2017	Line Contact - Other	Line Contact/Low Wire	
13					
AT&T	A [redacted] trash truck struck low hanging AT*T lines which damaged Franklin Township Trustees ESIP pole 55BB4A-34 near 1733 Elm Dr Kent, Ohio on 12/27/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
Time Warner Cable	A vehicle driven by [redacted] and owned by [redacted] snagged a low hanging Time Warner Cable wire and damaged pole 86EF-99 located at 2880 Park Avenue West, Mansfield, Ohio, on 10/13/2016.	2017	Oversize Vehicle	Line Contact/Low Wire	
Windstream Corporation	An unknown vehicle caught a low hanging Windstream wire and pulled dip pole over and blew fuse on pole 52CA2-10 near 986 River Rd. Hinkley, Ohio on 04/12/2017	2017	Low Foreign Utility	Line Contact/Low Wire	
Windstream Corporation	An unknown semi caught low Windstream wires from pole NF-4612 to pole NF-527 causing them to entangle and blow 3 fuses near 169 W Aurora Rd. Northfield, Ohio on 03/20/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
AT&T	An unknown semi caught low AT&T lines from pole 63BC2-14 near 3771 Selnik Rd Kent Ohio on 05/23/2017	2017	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
CenturyLink, CLAIMS DEPT	A unknown driver and unknown vehicle snagged a low CenturyLink cable attached to ESIP streetlight pole 104EZ1A-23 at the intresection of 4th St N and W Gregory St., Cardington, Ohio, on 06/26/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
AT&T	A vehicle owned by [redacted] and operated by [redacted] struck a low AT&T line and damaged pole 63BH4B-540 near 2010 Goodyear Blvd Akron, Ohio on 07/17/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	An unknown truck caught low Frontier wires and damaged transformer 59BS2D-515 near 3343 Sourek Rd. Akron, Ohio on 07/19/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
Spectrum	An unknown vehicle caught low Spectrum line from ESIP pole AK-4800 near 663 Seiberling St. Akron, Ohio on 07/20/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Spectrum	Expenses incurred to repair facilities damaged by Spectrum working on pole 62BL3C-527 near N Valley St. Akron, Ohio on 07/20/2017.	2017	Foreign Utility - N/A	Foreign Utility	
AT&T	A vehicle owned by [redacted] caught a low hanging Spectrum line (low due to rotten AT&T pole base) and brought down pole 59BC2D-49 near 132 W Oak St. Kent, Ohio on 07/06/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	Expenses incurred to replace a rotted Frontier pole and make safe Ohio Edison equipment on pole 5216D1-2 located near 917 Goldenrod Drive, Bellevue, OH, on 08/01/2017.	2017	Foreign Utility - N/A	Foreign Utility	
AT&T	A truck owned by [redacted] carrying a backhoe caught low hanging AT&T lines on pole 64AT3C-3 near 2670 State Route 44 Rootstown, Ohio on 08/14/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
Spectrum	A vehicle driven by [redacted] and owned by [redacted] caught a low hanging Spectrum wire and damaged pole 147HC-75 located near 2334 E Possum Rd., Springfield, Ohio, on 08/21/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
Spectrum	A [redacted] truck caught low hanging Spectrum wires on pole 59AT4C-13 near 5460 New Milford Rd. Ravenna, Ohio on 08/30/2017	2017	Oversize Vehicle	Line Contact/Low Wire	
CENTURY LINK	A vehicle driven by [redacted] and owned by [redacted] struck a low CenturyLink line and damaged Ohio Edison equipment on pole 82EC-15 located near 1208 Cairns Road, Mansfield, Ohio, on 10/03/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
AT&T	[redacted] was stuck in tree branches and had hooked low hanging AT&T wires from pole 57BA3D-35 near 6544 Schoolview Dr. Kent, Ohio on 09/19/2017	2017	Oversize Vehicle	Line Contact/Low Wire	
Windstream Corporation	A vehicle driven by [redacted] and owned by [redacted] Inc. snagged low hanging Windstream wires at pole 46CU2A-9 located near 37500 Butternut Ridge Rd., Elyria, Ohio, on 10/04/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
FRONTIER COMMUNICATIONS	A [redacted] vehicle caught low hanging Frontier lines which then damaged a guy wire on ESIP streetlight pole 94DG4A-55 located near 304 S Union Street, Loudonville, Ohio, on 10/30/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Spectrum	A vehicle owned by [redacted] caught low Spectrum lines at pole 55CA3-5 while backing the vehicle located near 1222 Ledge Rd, Medina, Ohio, on 09/21/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
FRONTIER COMMUNICATIONS	Expenses incurred to repair poles 62CF1-15 and 62CE2B-1 located near the intersection of River Styx Road and Sharon Cople Road, Medina, Ohio, due to a low Frontier Communications cable on 09/28/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Armstrong Cable	[redacted] came in contact with a low hanging Armstrong fiber optic line with his tractor which caused the primary and neutral wire to slap together located near 670 Linn Road, Mansfield, Ohio.	2017	Oversize Vehicle	Line Contact/Low Wire	
AT&T	[redacted] VEHICLE STRUCK LOW HANGING AT&T DROP CAUSING DAMAGE TO POLE # 63AZ1-10 LOCATED AT 3760 HOMESTEAD RD - RAVENNA, OHIO ON 10/30/17.	2017	Low Foreign Utility	Line Contact/Low Wire	
AT&T	A VEHICLE DRIVEN BY [redacted] AND OWNED BY [redacted] STRUCK A LOW HANGING AT&T WIRE WHICH DAMAGED POLE AND TRANSFORMER # 64AP3-8 LOCATED AT 3021 STROUP RD - EDINBURG TWP - ATWATER, OHIO ON 10/23/17.	2017	Low Foreign Utility	Line Contact/Low Wire	
24					
Verizon	Expenses incurred to replace pole and repair facilities at 10111 Jones Rd, Greene, Erie County, PA due to [redacted] delivery truck catching low Verizon wire on 11/15/2016.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Expenses incurred to transfer and repair facilities at 311 W. Main St (RT 49), Westfield, Tioga County, PA due to C & D Transport catching low Verizon line on 12/5/2016.	2017	Line Contact - Other	Line Contact/Low Wire	
Frontier Telephone	Expenses incurred to repair facilities at Steam Hollow Rd, Troy, Bradford County, PA due to a garbage truck owned by [redacted] catching Frontier telephone wires on 1/16/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
Time Warner Cable	Expenses incurred to repair facilities at RT 49, Elkland, Tioga County, PA due to truck catching low Time Warner Cable line on 5/15/2017. They had been notified on several occasions regarding their low lines.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Expenses incurred to repair facilities at Loomis St., North East, Erie County, PA due to [redacted] truck catching low Verizon Line on 6/6/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Expenses incurred to replace pole and repair facilities at 1561 E. Robison Rd, Greene, Erie County, PA due to vehicle owned by [redacted] Inc/operated by [redacted] catching Verizon wire on 6/14/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
Frontier Communications	Expenses incurred to repair facilities at SR 4015, Meshoppen, Wyoming County, PA due to low Frontier lines being caught by vehicle owned by [redacted]/operated by [redacted] on 4/23/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Frontier Communications	Expenses incurred to repair facilities at 187 Old State Rd, Falls, Wyoming County, PA due to Frontier Communication wires catching truck owned by [redacted] vehicle and operated by [redacted] on 7/6/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable (Spectrum)	Expenses incurred to repair facilities at 135 E. 1st St, Waterford, Erie County, PA due to vehicle owned by [redacted] catching service wires owned by Time Warner Cable on 7/27/2017.	2017	Oversize Vehicle	Line Contact/Low Wire	
Armstrong Telephone North	Expenses incurred to repair facilities at Looker Mtn Trail, Otto, McKean County, PA due to truck owned by [redacted]/operated by [redacted] catching low Armstong Telephone North line on 6/29/17.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Costs to replace fuse at pole #59596/repair faciliteis located on Birch Run Rd., Number 10 Rd, Snow Shoe Twp, Centre Co PA. Outage & damage occurred when a low Verizon wire was struck on 8/30/17.	2017	Line Contact - Other	Line Contact/Low Wire	
CenturyLink	Costs to replace fuse, repair & transfer facilities to CenturyLink pole (9-14194) located on 12969 Cumberland Hwy, Orrstown, Letterkenny Twp, Franklin Co PA after low CenturyLink wire was struck by a vehicle on 10/13/17.	2017	Low Foreign Utility	Line Contact/Low Wire	
Time Warner Cable (Spectrum)	Expenses incurred to repair facilities at E. 26th St, Erie, PA due to truck owned by [redacted]/operated by [redacted] catching low Spectrum cable wire on 11/13/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Costs to remove facilities on pole 8543-S located on Berlin & Jefferson Sts, Garrett , Somerset Co PA, damaged when contacted Verizon lines by the raised cover on a coal truck owned by [redacted] and operated by [redacted] on 10/25/17.	2017	Line Contact - Other	Line Contact/Low Wire	
Frontier Communications	Expenses incurred to repair facilities at RT 87, Mehopany, Wyoming County, PA due to Frontier Communications low line being caught by unknown vehicle on 9/19/2017.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon	Costs to inspect facilities located at 100 4th St, Ernest, Rayne Twp, Indiana Co PA, due to truck owned by [redacted] caught low Verizon lines on 10/31/17.	2017	Line Contact - Other	Line Contact/Low Wire	
16					
Spectrum	Low hanging fiber optic line near 4803 Oak harbor Rd (State Rt 19), Oak Harbor Ohio was struck by farm equipment which flipped into Toledo Edison electrical equipment causing outage.	2017	Low Foreign Utility	Line Contact/Low Wire	
CENTURY LINK	Low hanging Century Link road crossing was snagged at 9120 W Bancroft causing electrical outage and pole damage.	2017	Low Foreign Utility	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
Spectrum	Low hanging Spectrum cable crossing near 2303 S Crissey Rd, Holland Ohio was snagged by vehicle from [redacted] which Toledo Edison was asked to secure for safety and road to be reopened.	2017	Low Foreign Utility	Line Contact/Low Wire	
Spectrum	Private tree trimmer pulled into drive at 20748 Irene Ct, Bryan Ohio and caught low hanging Spectrum cable which Toledo Edison facilities to be damaged.	2017	Foreign Object	Line Contact/Low Wire	
AT&T RISK MANAGEMENT	Vehicle operated by [redacted] struck low hanging AT&T wire near 29108 Glenwood, Perrysburg Ohio which broke 2 Toledo Edison wood poles.	2017	Low Foreign Utility	Line Contact/Low Wire	
5					
WINDSTREAM COMMUNICATIONS	Charges incurred for repairing facilities located at Skytop Mountain Road, Port Matilda, PA (Centre Co.; Huston Twp.) due to accident on September 12, 2016.	2017	Low Foreign Utility	Line Contact/Low Wire	
VERIZON C/O SEDGWICK CMS	Charges incurred on March 6, 2017 for repairing facilities located at Herminie Road, Herminie, PA (Westmoreland Co.; Sewickley Twp.). Tractor trailer struck overhead communication line; tearing down WPP secondary line.	2017	Line Contact - Other	Line Contact/Low Wire	
VERIZON	Charges incurred on April 7, 2017 for repairing facilities located at Circle Drive, Pittsburgh., PA (Allegheny Co.; Upper St. Clair Twp.). Flooring truck caught Verizon line and pulled out anchor rod.	2017	Line Contact - Other	Line Contact/Low Wire	
VERIZON	Charges incurred on April 24, 2017 for repairing facilities located at Hunker Lumber Road in Hunker, PA (Westmoreland Co.; Hempfield Twp.). Tractor trailer caught Verizon line; knocked pole over, damaging 2 sections of overhead line.	2017	Line Contact - Other	Line Contact/Low Wire	
Verizon	Charges incurred on April 25, 2017 for repairing facilities located at Promessa Lane in Apollo, PA (Westmoreland Co.; Washington Twp.). Delivery truck struck low telephone cables.	2017	Low Foreign Utility	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on April 4, 2017 for repairing facilities located at Thompson Road in Tarentum, PA (Allegheny Co.; Fawn Twp.). Truck caught communication line; breaking pole.	2017	Low Foreign Utility	Line Contact/Low Wire	
AERO COMMUNICATIONS, INC.	Charges incurred for repairing facilities located near N. Central Avenue and W. Pike Street in Canonsburg, PA. (Washington Co.,Canonsburg Boro.) due to accident on August 3, 2016. [redacted]	2017	Foreign Utility - N/A	Foreign Utility	
VERIZON - PENNSYLVANIA C/O SEDGWICK	Charges incurred on May 19, 2017 for repairing facilities located at Hill Road in South Park, PA (Allegheny Co.; South Park Twp.). Dump truck caught Verizon line causing pole to break.	2017	Line Contact - Other	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on July 1, 2017 for repairing facilities located at Killdeer Lane in Ligonier, PA (Westmoreland Co.; Ligonier Twp.). Truck caught Verizon line; breaking pole.	2017	Low Foreign Utility	Line Contact/Low Wire	
VERIZON C/O SEDGWICK	Charges incurred on August 14, 2017 for repairing facilities located at Skellytown Road in North Huntingdon, PA (Westmoreland Co.; North Huntingdon Twp.). Truck caught phone lines.	2017	Line Contact - Other	Line Contact/Low Wire	

[redacted]

RP/Driver Name	Accident Description	Yr	Detail Cause	Cause	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on September 18, 2017 for repairing facilities located at Camp Avenue in New Kensington, PA (Westmoreland Co.; New Kensington Twp.). Tractor pulling rig caught communication line; breaking two poles.	2017	Oversize Vehicle	Line Contact/Low Wire	
Verizon c/o Sedgwick CMS Philadelphia	Charges incurred on August 8, 2017 for repairing facilities located at 1431 Water Street in Alverton, PA (Westmoreland Co.; East Huntingdon Twp.). Tractor Trailer snagged Verizon line while turning in parking lot; breaking two poles.	2017	Line Contact - Other	Line Contact/Low Wire	
12					
		2017 Total			
COMCAST	Charges incurred for repairing facilities located at Old Scales Road in Washington, PA (Washington Co.; South Franklin Twp.) due to accident on September 22, 2017. Vehicle struck low communication line.	2018	Low Foreign Utility	Line Contact/Low Wire	
1					
		2018 Total			
	2/6/2018				
		Grand Total			
157					

EXHIBIT C

DAMAGE CLAIM REPORT

FORM X-3228 (05-04) Page 1 of 2

CTCS CASE NO.	DATE OF INCIDENT 7-17-17	TIME REPORTED 1810
CREWS REPORT NO.	POLICE REPORT NO.	CLAIM NO. (Assigned by Claims Department)
WITNESS DLN DCA		PHONE NO.
ADDRESS N. Randolph	CITY	STATE / ZIP CODE
WITHIN THE INTERSECTION OF	IF NOT INTERSECTION ____ MILES ____ FEET	
DIRECTION ☒ NORTH ☐ SOUTH ☐ EAST ☐ WEST	NEAREST STREET OR HOUSE NO.	

TYPE OF INCIDENT ☒ CAR/POLE ☐ DIG-IN ☐ TREE ☐ OTHER _____

PROPERTY INVOLVED	CHECKLIST
☐ OE OWNED OVERHEAD	☐ CALL DDO WITH ASSESSMENT OF DAMAGE TO OE PROPERTY
☐ OE OWNED UNDERGROUND	☐ GATHER INFORMATION , TAKE PICTURES USING REFERENCE GUIDE/RULER
☐ CUSTOMER OWNED OVERHEAD	PICTURES TAKEN BY / DATE
☐ CUSTOMER OWNED UNDERGROUND	☐ FORWARD ALL INFORMATION TO FOREMAN (Foreman Will Notify OUPS)
☐ E.S.I.P.	☐ FORWARD INFORMATION FOLDER TO CLAIMS
☐ DAMAGE TO CUSTOMER PROPERTY	

DESCRIPTION OF INCIDENT

Tractor Trailer hook phone line with his load and broke 4 poles off.

OVERHEAD	UNDERGROUND
POLE NO. A3464, 1A4516, 1A4515, A3470	WAS IT LOCATED ☐ FLAGS ☐ PAINT ☐ NOT LOCATED
POLE SET DATE	CONTRACTOR OUPS NO.
POLE OWNER	DISTANCE FROM SPOT TO DIG-IN ____ FEET ____ INCHES
LOW WIRE? ☐ YES ☐ NO	DEPTH OF UNDERGROUND FACILITIES ____ FEET ____ INCHES
IF LOW WIRE, NAME OF OWNER OF WIRE	OE GENERATED OUPS NO.
	OUPS CONTACTED BY / DATE

PERSON RESPONSIBLE [redacted]	HOME PHONE NO.
EMPLOYER OF PERSON RESPONSIBLE (If Applicable)	WORK PHONE NO.
ADDRESS OF EMPLOYER (If Applicable) / CITY / STATE / ZIP CODE	
INSURANCE CO.	INSURANCE PHONE NO.
REPORT PREPARED BY	DATE
APPROVED BY REC	DATE 7-19-17

401 Davis Avenue
Elkins, WV 26241
304-636-0678

Call Summary Report

Date Printed
8/3/2017 12:15

Call Details

Call Number:	C17-0002232	Responding Officer:	[redacted]
Date/Time Reported:	7/17/2017 18:00	Time Arrived:	7/17/2017 18:04
Time Dispatched:	7/17/2017 18:02	Call Type:	DESTRUCTION OF PROPERTY
How was call received?:	911		
Municipality:	Elkins		
Date / Time Approved:	7/23/2017 13:05	Approving Officer:	[redacted]

Time Cleared: 7/17/2017 21:26

Dispatch Location Information

Dispatch Location: NORTH RANDOLPH EXTENTION, ELKINS WV 26241

Latitude: Longitude: Altitude:

Complainant / Contact Information

Person/Org: [redacted] Address:
Business Ph: -- Mobile Ph: -- DOB: 12/16/1977
Home Ph: -- Other Ph: --
Role: DRIVER

Person/Org: CITY OF ELKINS Address: 401 DAVIS AVENUE, ELKINS WV 26241
Business Ph: [redacted] Mobile Ph: -- DOB:
Home Ph: -- Other Ph: [redacted]
Role: COMPLAINANT

Vehicle Information

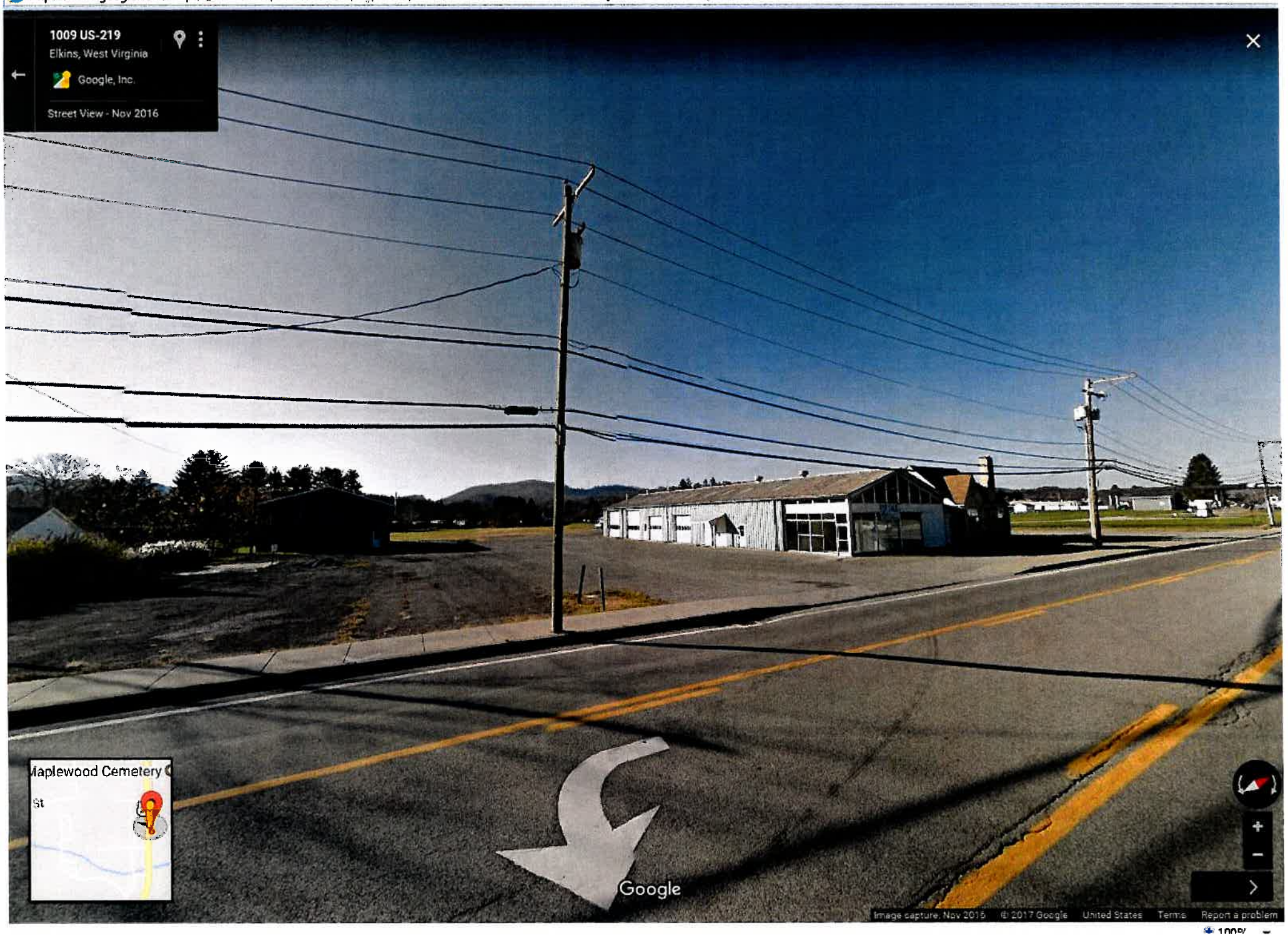
Vehicle: [redacted] Vin: [redacted]

Vehicle: [redacted]: 1988 BLACK TRAILER Vin: [redacted]

Call Notes

On July 17, 2017 I Corporal [redacted] was dispatched to North Randolph Avenue within the City of Elkins, County of Randolph, State of West Virginia in reference to power lines being down. Upon arrival I Corporal [redacted] observed that a tractor and trailer had attempted to pull into the old Teter Motors parking lot to drop heavy equipment off to a construction crew and snagged the power line. this resulted in breaking four telephone poles and leaning one over, causing the wires to be on the truck and the ground for roughly 1/8 to 1/4 mile. One of the telephone poles fell onto the roof of the Old Teter Motors causing damage to it. DOT Officer [redacted] inspected the truck of which resulted in the truck being legal height and under 13' 6". Driver name is [redacted] company is [redacted] [redacted], phone number for company is [redacted]. Insurance company for the business is [redacted] [redacted] Policy number [redacted] and expires [redacted], phone number [redacted]. This is an information report due to no crime, and nothing that can be produced on an accident report. Pictures along with Officer [redacted] report is attached. Nothing Further.

Dispatch Record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© 2017 Google
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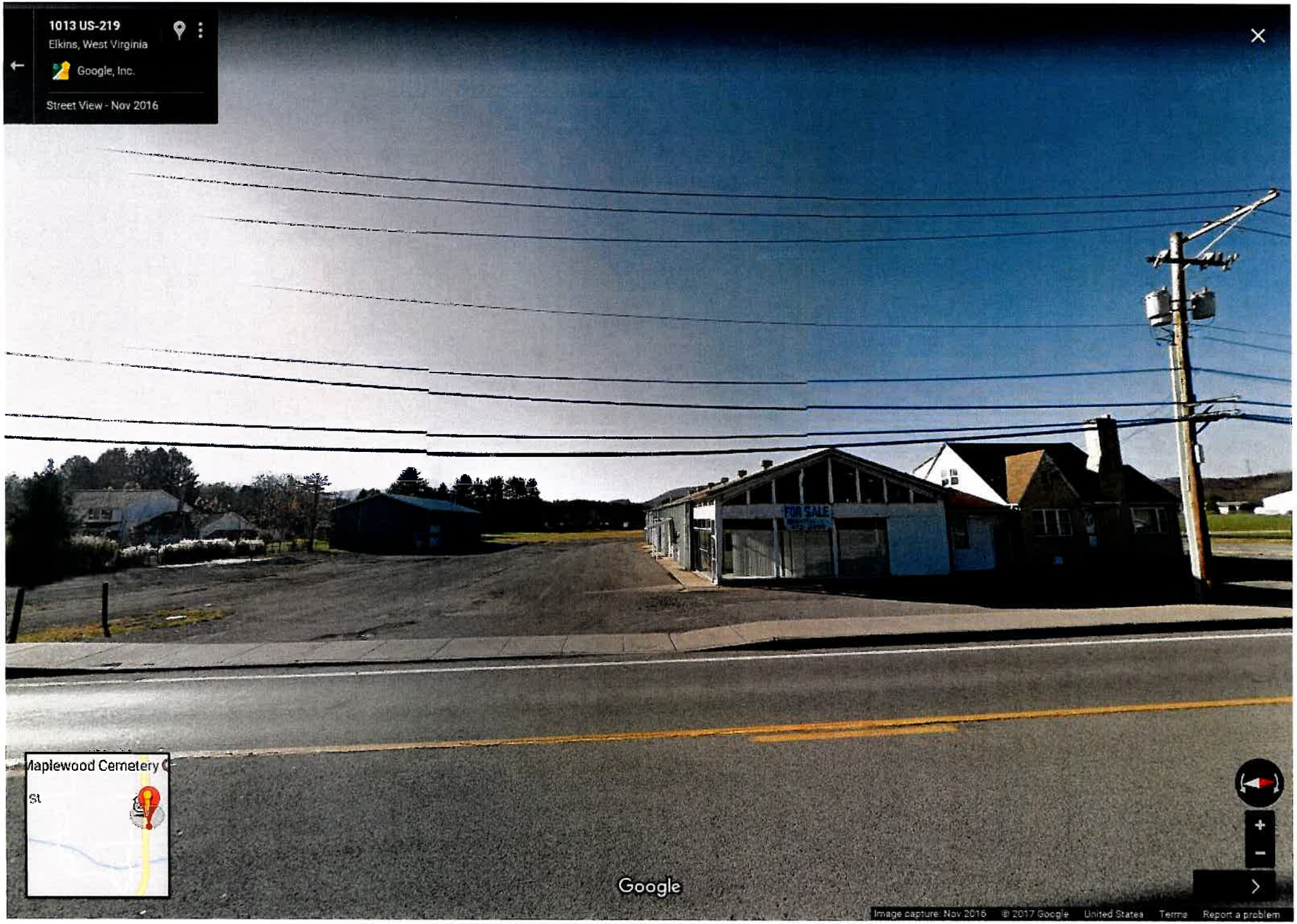
Terms
Report a problem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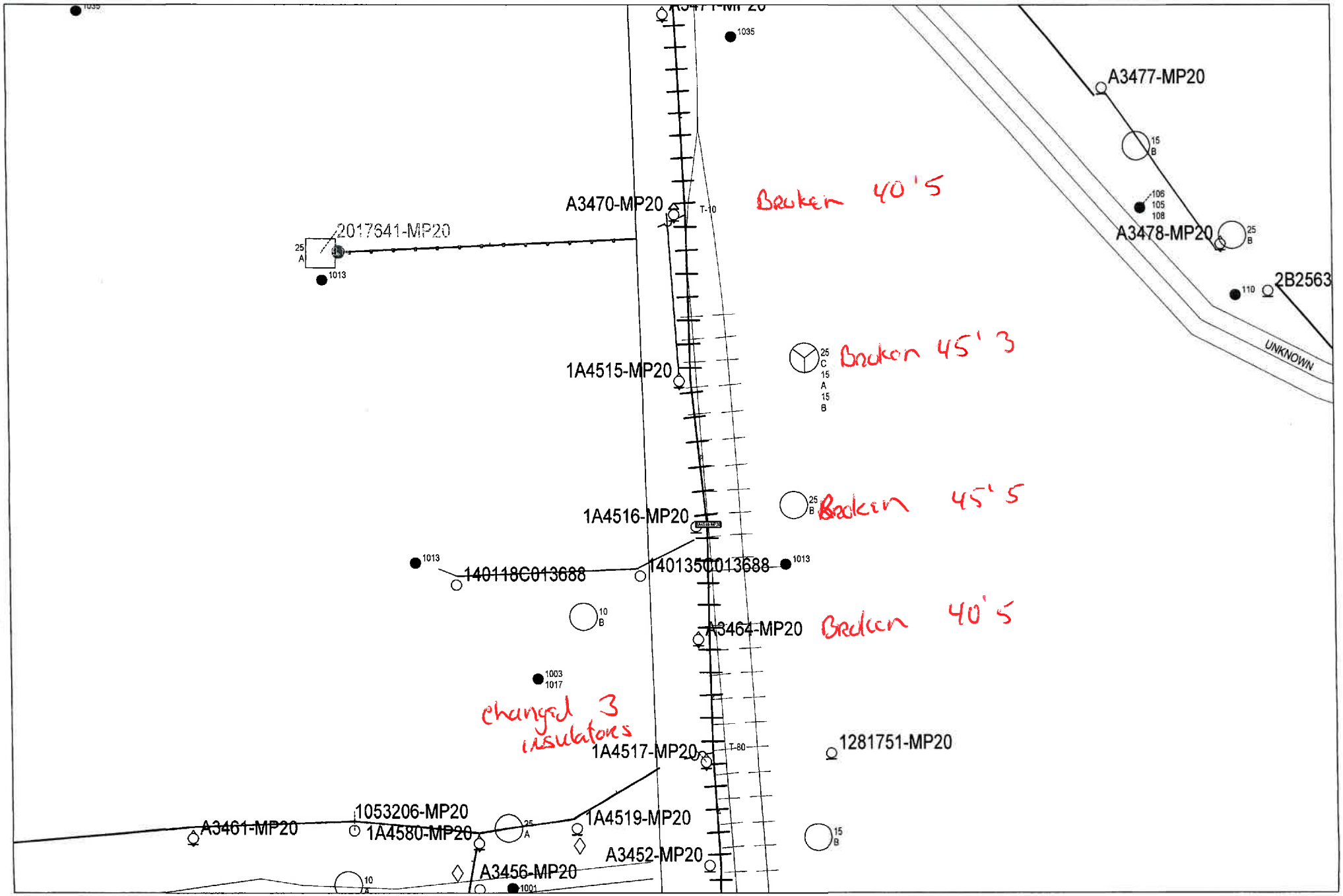

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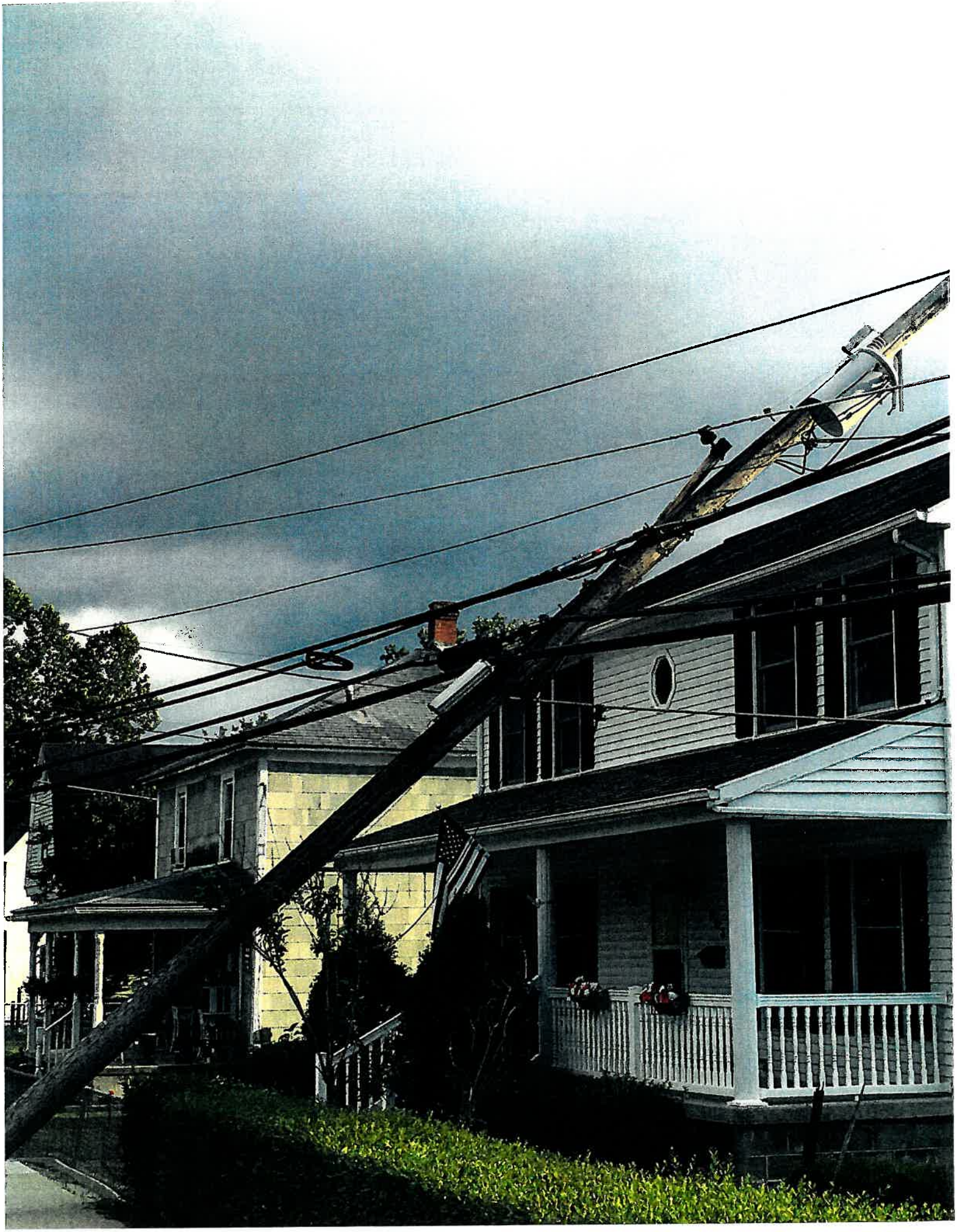

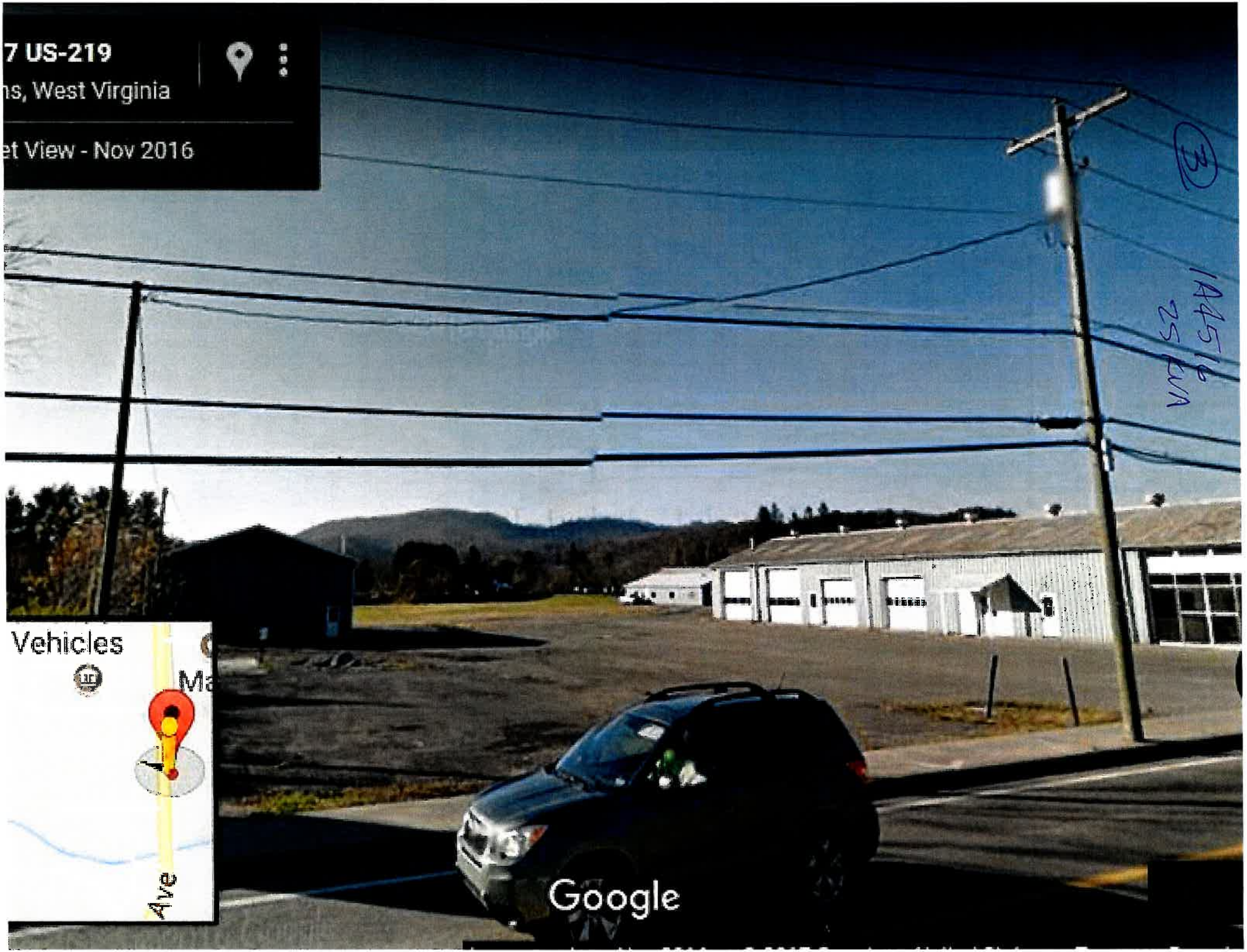
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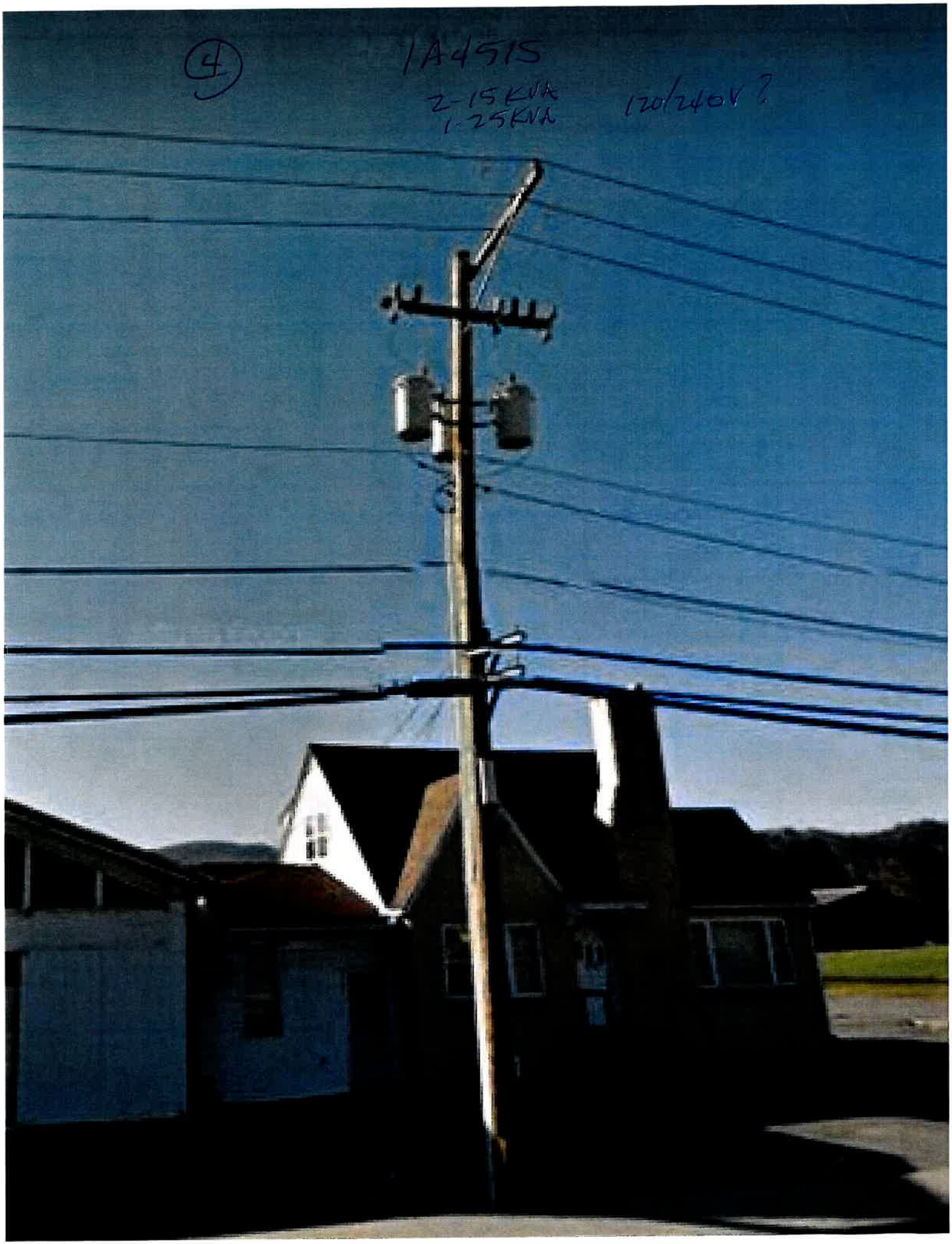
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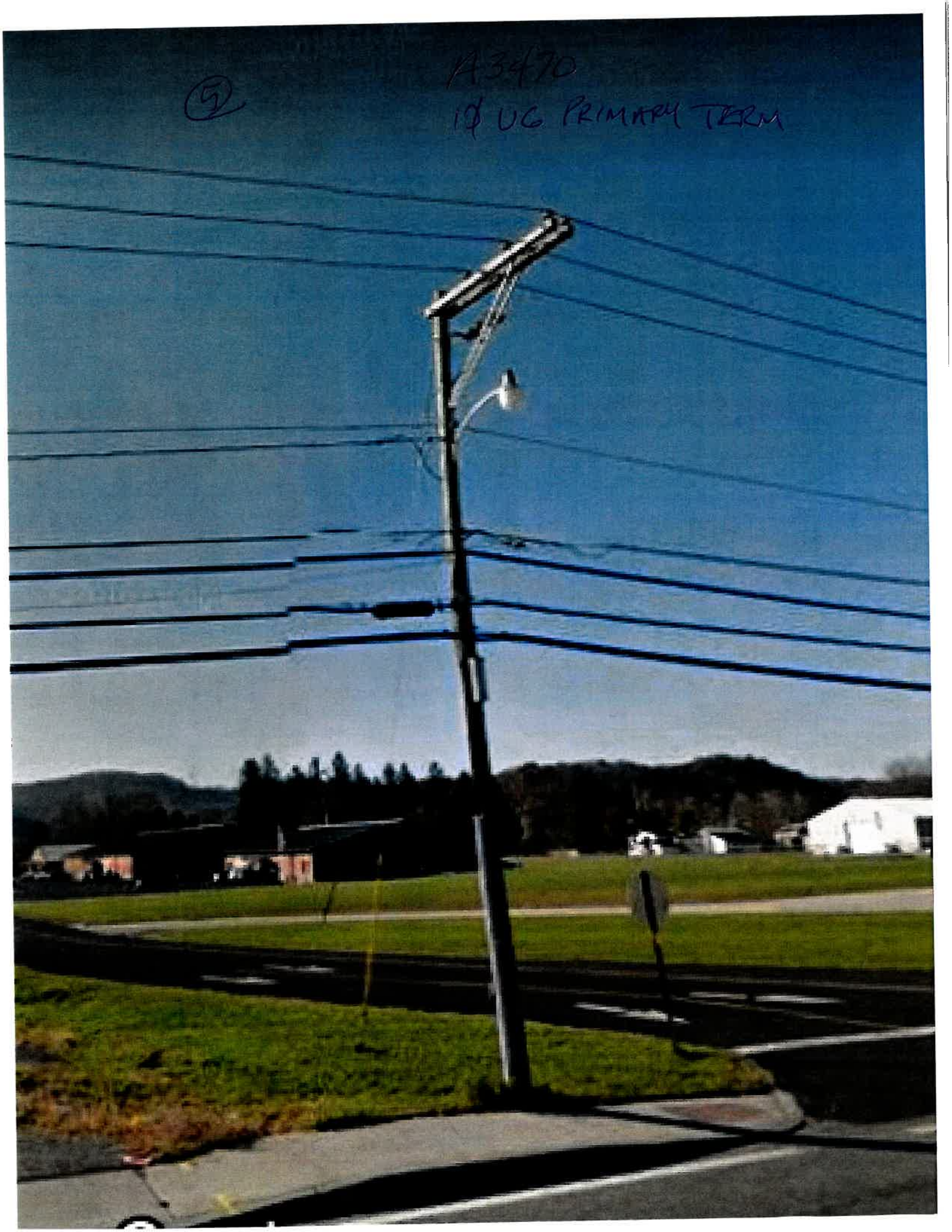
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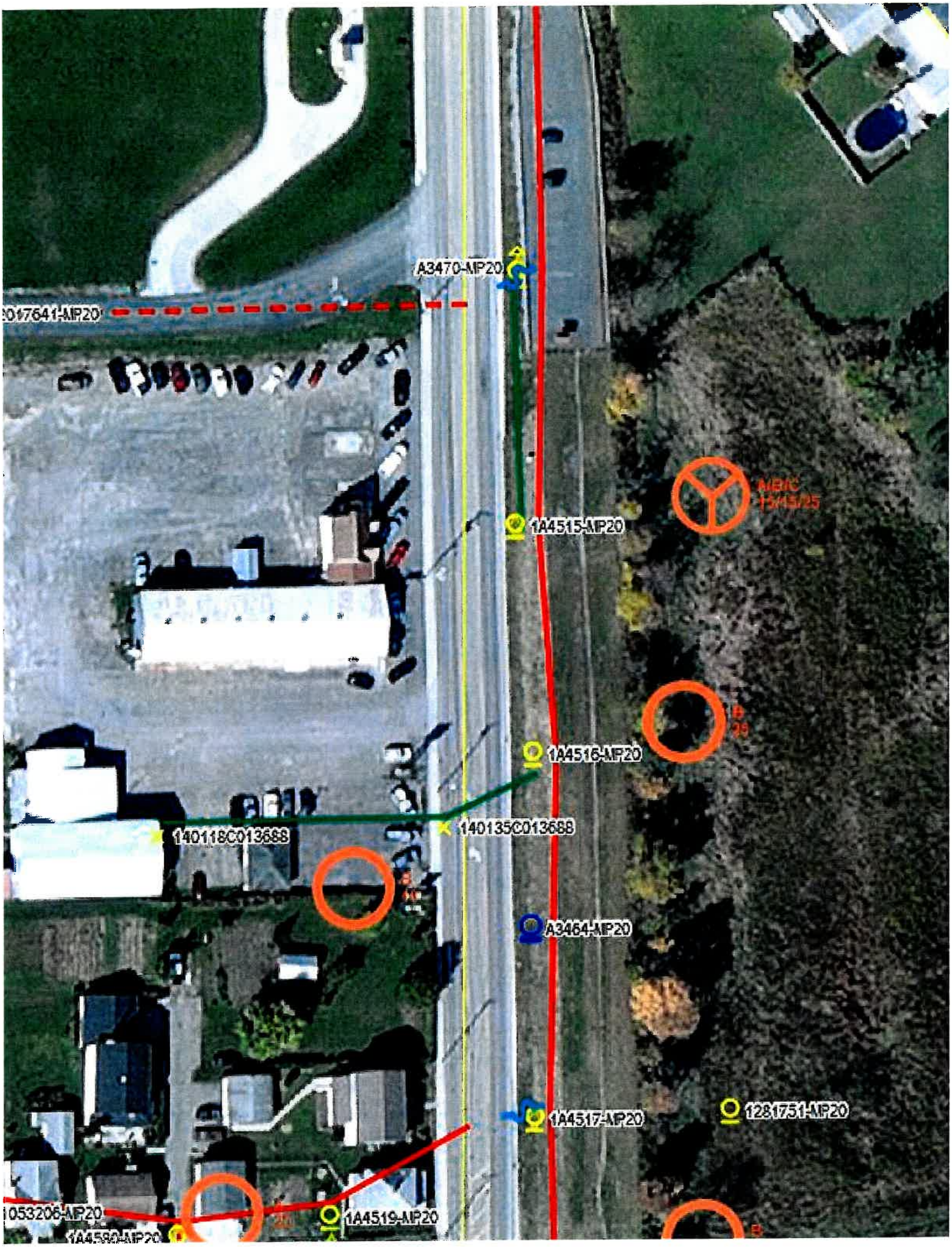
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